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July 9, 2024

U.S. Magistrate Judge Daniel J. Stewart  
United States District Court  
Northern District of New York  
445 Broadway, Room 409  
Albany, New York 12207

*via CM/ECF*

*Re: Nadine Gazzola, et al. v. Gov. Kathleen Hochul, et al.*  
Case No. 1:22-cv-1134 (BKS/DJS)

To the Hon. Daniel J. Stewart:

This letter a joint counsel request for modification to one item in the Text Order 90, dated July 2, 2024. The text order included a line not discussed during the teleconference of that date. Specifically, "Initial Written Discovery Demands must be served by August 9, 2024." Counsel request this be changed to the date of September 13, 2024.

This change of date will allow the initial document discovery exchange, as well as its use in crafting the first round of written demands. It is likely to result in a more efficient discovery process.

This letter is submitted with pre-filing review and approval as to form of Ms. Cowan.

Respectfully submitted,  
*Paloma A. Capanna*  
Paloma A. Capanna

c.: Aimee Cowan, Esq., NYS Office of the Attorney General (via CM/ECF)